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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

10 CALIFORNIANS FOR ALTERNATIVES TO) Case No. CIV 06-00002 EDL
TOXICS, a California non-profit corporation; and)
11 ENVIRONMENTAL PROTECTION)
INFORMATION CENTER, a California non-profit)
corporation;)
12 Plaintiffs,)
13 v.)
14 EVERGREEN PULP INC.,)
15 Defendant.)
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) **STIPULATION AND [PROPOSED]**
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Judge: Magistrate Judge Laporte

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25 Attorneys for Defendant
26 EVERGREEN PULP, INC.

- 1 A. WHEREAS, pursuant to the Court's order of May 11, 2006, plaintiffs Californians for
2 Alternatives to Toxics and The Environmental Protection Information Center (collectively
3 "Plaintiffs") and Defendant Evergreen Pulp, Inc. ("Evergreen"), collectively, the "Parties," must
4 prepare and produce privilege logs "no later than 14 days after discovery responses are due,
5 unless the Court orders otherwise in a particular case."
- 6 B. WHEREAS, on May 17, 2006, Evergreen responded to Plaintiffs first set of requests for
7 production of documents, which response was due on May 18, 2006. Evergreen's privilege log
8 associated with the response is therefore required to be produced on or before June 1, 2006.
- 9 C. WHEREAS, the Parties have agreed and stipulate that Evergreen may have until June 15,
10 2006 to produce the privilege log associated with Evergreen's response to Plaintiffs first set of
11 requests for production of documents.

12 Respectfully submitted,

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1 Dated: May 30, 2006

2 KLAMATH ENVIRONMENTAL LAW CENTER
3 WILLIAM VERICK

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6 HELEN KANG

7 CENTER ON RACE, POVERTY & THE
8 ENVIRONMENT
9 LUKE COLE

10 By: /s/ William Verick
11 WILLIAM VERICK
12 Attorneys for Plaintiffs

13 Californians For Alternatives to Toxics and
14 Environmental Protection Information Center

15 Dated: May 30, 2006

16 ALLEN MATKINS LECK GAMBLE &
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20 MARC A. ZEPPETELLO

21 By: /s/ David D. Cooke
22 DAVID D. COOKE
23 Attorneys for Defendant
24 Evergreen Pulp, Inc.

25 Attestation Regarding Signature: This document is being filed electronically under my User ID and
26 Password. Pursuant to General Order 45, Section X.B, I hereby attest that concurrence in this filing of
this document has been obtained from each of the other signatories to this document.

I declare under penalty of perjury under the laws of the United States that the foregoing is true
and correct. Dated May 30, 2006, in San Francisco, California.

27 /s/ David D. Cooke

28 DAVID D. COOKE

1 [PROPOSED] ORDER
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3 Based upon the stipulation of the Parties herein, it is hereby ordered that defendant Evergreen Pulp, Inc.
4 ("Evergreen") may have until June 15, 2006 to produce the privilege log associated with Evergreen's
5 response to the first set of requests for production of documents of plaintiffs Californians for
6 Alternatives to Toxics and The Environmental Protection Information Center.

7 Dated: May 31, 2006

